

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

POWERTRAIN, INC.

PLAINTIFF

v.

Cause No: 1:11-cv-0015-GHD-DAS

**JOYCE MA and BEST MACHINERY
& ELECTRICAL, INC.**

DEFENDANTS

JOYCE MA

THIRD PARTY PLAINTIFF

v.

**WILLIAM SHAWN and
SHAWNCOLSON, LLP**

THIRD PARTY DEFENDANTS

MOTION FOR TIME TO ANSWER OR OTHERWISE PLEAD

William H. Shawn and ShawnColson, LLP file this Motion for Time to Answer or Otherwise Plead and asks that they be allowed an additional ten days within which to answer, making an answer due on February 14, 2014. As grounds therefore, they would show the following:

1. Undersigned counsel was retained in this case on Friday, January 31, 2014 and is only now becoming familiar with the issues in this complicated multi-party case.

2. The attorney for the third party plaintiff, Joyce Ma, has consented to this extension of time.

Respectfully submitted this the 3rd day of February, 2014.

s/ T.H. Freeland, IV
T.H. Freeland, IV
Bar No. 5527

OF COUNSEL:

FREELAND & FREELAND, LAWYERS
1013 JACKSON AVE, P.O. Box 269
OXFORD, MS 38655
(662) 234-3414

CERTIFICATE OF SERVICE

I hereby certify that on this day I have caused a copy of the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following CM/ECF participant attorneys of record:

Duncan Lott
Langston & Lott
P. O. Box 382
Booneville, MS 38829-0382

Jeffery M. Navarro
P.O. Box 162
Amory, MS 38821

This the 3rd day of February, 2014.

s/ T.H. Freeland, IV
T.H. Freeland, IV